

Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, NY 10022



troutman.com

Daniel E. Gorman
daniel.gorman@troutman.com

August 19, 2024

Magistrate Judge Steven Locke
Eastern District Court New York
100 Federal Plaza, Room 820
Central Islip, New York 11722

Re: *SiteOne Landscape Supply, LLC v. Nicholas Giordano et al.* (2:23-cv-02084)
Request to File Motion to Quash Under Seal

Dear Judge Locke:

Plaintiff SiteOne Landscape Supply, LLC ("SiteOne") submits this letter to respectfully request permission to file under seal a motion to quash certain portions of subpoenas issued by Defendants Dominick Caroleo ("Don"), The Garden Dept. Corp., 3670 Route 112 LLC, and 9 4th St., LLC (collectively, the "Don Defendants") to Wells Fargo Bank, N.A. and JP Morgan, Chase Bank, N.A., dated July 31, 2024 (the "Subpoenas"), which Subpoenas seek the production of certain records related to SiteOne's bank accounts.

As relevant to the request to seal, the Subpoenas seek records pertaining to Laura Shartle, Trisha Earls, and the Hawkins Firm, LLC. The facts surrounding why the Don Defendants contend these records may be relevant are the subject of a confidentiality agreement and therefore may not be publicly disclosed. Accordingly, SiteOne respectfully requests that this Court permit SiteOne to file a motion to quash the portions of the Subpoenas related to Laura Shartle, Trisha Earls, and the Hawkins Firm, LLC under seal.¹

To the extent the Court has any questions concerning SiteOne's motion to seal or the confidentiality agreement referenced herein, SiteOne is available for a conference at the Court's convenience.

We thank Your Honor for your consideration and attention to this matter.

Respectfully submitted,

/s/ Daniel E. Gorman

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¹ A motion to quash the remaining portions of the Subpoenas is being filed concurrently with this application.